

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**MICHAEL FEDER, *on behalf of himself and all  
others similarly situated***

***Plaintiff,***

**vs.**

**AMERICAN INTERNATIONAL GROUP, INC.,  
MAURICE GREENBERG, HOWARD SMITH,  
AND THOMAS TIZZIO**

**CA NO. 1:04-CV08141 (LTS)**

**JEROME NOLL, *individually and on behalf of all  
others similarly situated***

***Plaintiff,***

**vs.**

**AMERICAN INTERNATIONAL GROUP, INC.,  
MAURICE GREENBERG, HOWARD SMITH,  
AND THOMAS TIZZIO**

**CA NO. 1:04-CV08226 (LTS)**

**STEPHAN FRANK, *on behalf of himself and all  
others similarly situated***

***Plaintiff,***

**vs.**

**AMERICAN INTERNATIONAL GROUP, INC.,  
MAURICE GREENBERG, HOWARD SMITH,  
AND THOMAS TIZZIO**

**CA NO. 1:04-CV08292 (LTS)**

Caption continued on next page

**JOSEPH SCUILLA, *individually and on behalf of  
all others similiary situated***

***Plaintiff,***

**vs.**

**AMERICAN INTERNATIONAL GROUP, INC.,  
MAURICE GREENBERG, HOWARD SMITH,  
AND THOMAS TIZZIO**

**CA NO. 1:04-CV08336 (LTS)**

**EUGENE OLSON**

***Plaintiff,***

**vs.**

**AMERICAN INTERNATIONAL GROUP, INC.,  
MAURICE GREENBERG, HOWARD SMITH,  
AND THOMAS TIZZIO**

**CA NO. 1:04-CV08339 (LTS)**

**ROBERT J. CASEY, II, *on behalf of himself and all  
others similiary situated***

***Plaintiff,***

**vs.**

**AMERICAN INTERNATIONAL GROUP, INC.,  
HOWARD SMITH, AND THOMAS TIZZIO**

**CA NO. 1:04-CV08366 (LTS)**

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**LISA M. CROUCH, *on behalf of herself and all others similiary situated***

***Plaintiff,***

**CA NO. 1:04-CV08579 (LTS)**

**vs.**

**AMERICAN INTERNATIONAL GROUP, INC.,  
MAURICE GREENBERG, HOWARD SMITH,  
AND THOMAS TIZZIO**

**MICHAEL CASSIDY, *individually and on behalf of others similiary situated***

***Plaintiff,***

**CA NO. 1:04-CV08642 (LTS)**

**vs.**

**AMERICAN INTERNATIONAL GROUP, INC.,  
MAURICE GREENBERG, HOWARD SMITH,  
AND THOMAS TIZZIO**

**NOTICE OF MOTION AND MOTION OF THE ARKANSAS PUBLIC EMPLOYEES  
RETIREMENT SYSTEM FOR CONSOLIDATION, APPOINTMENT  
AS LEAD PLAINTIFF, AND FOR APPROVAL OF LEAD PLAINTIFF'S  
CHOICE OF LEAD COUNSEL**

PLEASE TAKE NOTICE that upon the Memorandum of Law in Support of the Arkansas Public Employees Retirement System's ("Movant" or "APERS") Motion for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Counsel and the accompanying Declaration of Catherine A. Torell, and all prior papers and proceedings herein, Movant hereby seeks an order: (i) consolidating all related actions; (ii) appointing APERS as Lead Plaintiff in this action; and (iii) approving its selection of the law firm Cohen, Milstein, Hausfeld & Toll, P.L.L.C. as Lead Counsel.

DATED: December 14, 2004

Respectfully submitted,

/s/

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